

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-24, 26-30 and 33-52 are pending in the present application. Claims 1, 4, 14-17, 23 and 33 are amended by the present amendment. No new matter is added.

In the outstanding Office Action, Claims 14-17 were rejected under 35 U.S.C. §112, second paragraph, as indefinite; Claims 1, 3, 6, 7, 18, 21, 33-38, 41-43, 48 and 51 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano et al. (U.S. Pat. No. 5,289,234, herein "Asano") in view of Suzuki et al. (U.S. Pat. No. 6,041,203, herein "Suzuki"); Claims 4, 23, 26 and 28-30 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano, Suzuki and in view of Saito et al. (U.S. Pat. Pub. 2003/0091366, herein "Saito"); Claim 2 was rejected under 35 U.S.C. §103(a) as unpatentable over Asano, Suzuki in further view of Noda et al. (U.S. Pat. Pub. No. 2002/0122677, herein "Noda"); Claims 8, 9, 44 and 45 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano in view of Suzuki in further view of Ebata et al. (U.S. Pat. No. 5,023,660); Claims 10-12 and 46-47 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki in view of Kinoshita et al. (U.S. Patent 5,404,203 herein "Kinoshita"); Claim 13 was rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki in view of Miyabe et al. (U.S. Patent 5,950,047 herein "Miyabe"); Claims 14 and 15 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki in view of Ojima et al. (U.S. Publication 2004/0191663 herein "Ojima"); Claim 16 was rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki in view of Ojima and Yamashiro et al. (U.S. Patent 5,328,795 herein "Yamashiro"); Claim 17 was rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki in view of Ojima and Inoue et al. (Japanese Publication 2000-172015 herein "Inoue"); Claims 19, 20 and 22 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki or

alternatively over Asano, Suzuki and Saito in view of Keen (U.S. Patent 4,816,877); Claims 39 and 40 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki in view of Kosuge (U.S. Publication 2003/004201); Claims 49, 50, and 52 were rejected under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki in view of Keen; and Claims 5, 24 and 27 were indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicants gratefully acknowledge the indication of allowable subject matter in Claims 5, 24 and 27.

With respect to the rejection of Claims 14-17 under 35 U.S.C. §112, second paragraph, Claims 14-17 have been amended to recite "...said developing unit is packed with a toner..." Accordingly, Applicants respectfully submit that the rejection under 35 U.S.C. §112, second paragraph is overcome. Thus, Applicants respectfully request that the rejection of Claims 14-17 under 35 U.S.C. §112, second paragraph, be withdrawn.

Addressing now the rejection of Claims 1, 3, 6, 7, 18, 21, 33-38, 41-43, 48 and 51 under 35 U.S.C. §103(a) as unpatentable over Asano and Suzuki and the rejection of Claims 4, 23, 26 and 28-30 under 35 U.S.C. §103(a) as unpatentable over Asano, Suzuki and Saito, Applicants respectfully traverse these rejections.

Claim 1 recites, in part,

a latent image bearing member, supported by the frame body, and replaceable in the process cartridge in a first direction via the space formed by the first and second frame bodies;

a developing unit supplying a developing agent to the latent image bearing member, the developing unit configured to be replaceable in the process cartridge in the closed state in a second direction substantially perpendicular to the first direction via a space in the process cartridge different than the space formed by the first and second frame bodies and configured to be replaceable in the process cartridge in a state where the latent image bearing member is supported by the frame body; and

Claims 4 and 23 recite similar features with regard to the developing unit being replaceable in a second direction substantially perpendicular to the first direction. Claim 33 recites that at least one process unit is similarly replaceable.

Asano describes an image forming apparatus having a detachable imaging cartridge 10 (e.g., process cartridge) that is made of (1) a portion 102 that includes a developing device 3,<sup>1</sup> (2) a photosensitive drum 1 and (3) a portion 101. According to the structure of Asano, the photosensitive drum 1 is removable in a direction shown in Figure 9.

Suzuki describes a process unit that includes a photosensitive member cartridge having a photosensitive member and a developer cartridge that is removable from the process unit in a direction shown in Figure 4.

The outstanding Action acknowledges on page 9 that Asano does not describe or suggest a developing unit configured to be replaceable in the process cartridge in the closed state via a space in the process cartridge different than the space formed by the first and second frame bodies.

Nevertheless, the outstanding Action cites Suzuki as curing this deficiency in Asano. Specifically, the outstanding Action combines the removable developer cartridge from the process unit in Suzuki with the imaging cartridge 10 of Asano.

However, Applicants respectfully submit that the combination of Asano and Suzuki does not describe or suggest a developing unit supplying a developing agent to the latent image bearing member, the developing unit configured to be replaceable in the process cartridge in the closed state in a second direction substantially perpendicular to the first direction via a space in the process cartridge different than the space formed by the first and second frame bodies, as is recited in Claim 1.

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<sup>1</sup> Asano at Abstract and Fig. 10.

In other words, the direction in which the photosensitive drum 1 of Asano is replaced and the direction in which the developer cartridge 4 of Suzuki would be replaced, if the developer cartridge 4 of Suzuki were to be substituted for the developing device 3 in Asano, are not substantially perpendicular.

Due to the particular structure of the developer cartridge 4 of Suzuki, this cartridge 4 must be removed/replaced into the process unit in a specific direction. Similarly the photosensitive drum 1 of Asano must also be removed/replaced in a specific direction. However, if the developer cartridge 4 of Suzuki were to replace the developing device 3 of Asano, the developer cartridge 4 would have to be replaced on the opposite side of the cartridge 10 as the photosensitive drum 1 and would not be removable in a substantially perpendicular direction to the direction in which the drum 1 was removed. This would make the removal process more difficult as compared with the claimed configuration. Thus, the combination of Asano and Suzuki cannot be held to anticipate the developing unit as is recited in Claim 1.

In addition, the further cited Saito reference does not cure the above noted deficiencies of Asano and Suzuki with regard to this feature.

Accordingly, Applicants respectfully submit the Claims 1, 4, 23 and 33 patentably distinguish over Asano, Suzuki and Saito.

Moreover, Applicants respectfully submit that none of the further cited Noda, Ebata, Kinoshita, Miyabe, Ojima, Yamashiro, Inoue, Keen or Kosuge references cures the above noted deficiencies of Asano, Suzuki and Saito.

Therefore, Applicants respectfully submit that independent Claims 1, 4, 23 and 33, and claims depending therefrom, are allowable.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

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